



MODERN SLAVERY STATEMENT



CORPORATE RESPONSIBILITY

ENVIRONMENTAL SUSTAINABILITY



The Modern Slavery Act 2015 ('the Act') creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. The Bradfords Group Limited ('the Bradfords Group') is committed to supporting both the aims and the letter of the Act, namely to combat all forms of modern slavery and human trafficking and improve our practices across our group to help achieve this.

1 OUR BUSINESS

We are one of the UK's leading independent distributors of construction materials, operating within England & Wales, supplying primarily the construction sector. Our subsidiary companies include:

- Bradfords Building Supplies Limited which is a builders merchant for building materials and products
- Snows Timber Limited which provides wholesale wood products to builders' merchants, timber merchants, garden building and shed manufacturers, and to the joinery manufacturing and constructions sectors and
- YPS Limited which is a plumbing and heating merchant.

2 OUR PEOPLE

As a Group, at 30th June 2018, we employed approximately 1000 employees across 50 sites in the UK. We are an Investors in People accredited employer. Across The Bradfords Group, we are committed to conducting business strictly in accordance with all applicable laws and regulations in the UK, including health & safety, environmental, anti-bribery, equality and employment legislation. This extends to maintaining high standards of behaviour amongst our employees through our training and development initiatives which form part of our continuing Investors in People accreditation.

We have established rigorous HR processes, systems and controls to ensure:

- All employees are assessed for their right to work in the UK

- Workplace equality policies and practices are in place, promoted and implemented
- Remuneration and benefit schemes comply with relevant UK employment legislation

We continually review and develop our policies, procedures, systems and controls to ensure ethical and legal compliance.

We actively encourage our employees to confidentially report any concerns or breaches e.g. suspected unethical behaviour and wrong-doing. We have an independent whistleblowing hotline to ensure that all of our employees have a voice that will be heard in confidence – 24 hours a day, every day of the year. All matters raised either via whistleblowing or through the auditing processes are investigated and appropriate action is taken in accordance with our policies and procedures.

3 OUR SUPPLY CHAINS

We purchase and source products primarily from countries within the EU, including the UK, but also globally on a much smaller scale. From the suppliers with whom we have direct purchasing relationships, we seek assurance during negotiations of the same high standards of corporate and ethical responsibility as we adhere to ourselves.

A proportion of our purchasing is through agents and intermediaries. Where this occurs, we recognise our ability to influence labour standards and human rights further back along supply chains is limited to a degree, as we may be only one of many international customers in an extensive global marketplace. Owing to these global suppliers, we recognise that some countries in our supply chain may present an increased risk of modern slavery. Accordingly, we are committed to investigating what more can be reasonably done in this regard to help our effectiveness at mitigating human trafficking and promoting anti-slavery within our supply chain.

Our timber purchasing complies with the EU Timber Regulation and we are Timber Trade Federation Responsible Purchasers, which requires continuing due diligence in our supply chains. We have held Forest Stewardship Council® (FSC®) and Programme for the Endorsement of Forest Certification™ (PEFC™) chain of custody for over a decade. These schemes address the rights of local and indigenous peoples in the countries where the producing certified forests are located. We are also highly active in promoting responsible purchase of certified wood and construction wood-based products in the market sectors we supply.

4 IDENTIFYING AND MITGATING RISKS

During the initial reporting period, we have identified that any potential risk of human trafficking and slavery, however remote, may occur in overseas supply chains beyond the EU and North America. To signal our intentions to our supply chain, we have, during the period, moved to a chain of custody basis for certain materials and products we purchase from these countries.

During the initial reporting period, we have also come to understand that we have much yet to learn regarding labour standards and human rights in the countries outside the EU and North America in our supply chain. We will be taking steps in the forthcoming financial year to increase our knowledge and understanding of labour standards in those countries, looking at implementing various measures to identify and mitigate risk and building on the approach deployed to ensure that we operate, as far as possible free from enforced labour, human trafficking and slavery.

5 STEPS TAKEN: 2016 – 2018

Over the past 18 months we have:

- Brought our standpoint and responsibilities to the fore in our communications with all stakeholders
- Developed a specific Modern Slavery Act eLearning training module which will be rolled out to all relevant employees during 2018
- Developed an internal 'Code of Conduct' which will be launched during 2018
- Developed and published our own internal Anti-Slavery and Human Trafficking Policy (POL-BS-003)

6 STEPS TO TAKE: 2018 – 2020

In developing our response to, understanding and support of, the aims and requirements of the Act, going forward we will over the next 18 months:

- Seek an appropriate industry tool or benchmark against which we can monitor current and future performance and effectiveness in relation to the Act
- Continue to bring our standpoint and responsibilities to the fore in our communications with all stakeholders
- Establish a regular reporting cycle through our management team and board of directors, and ensure our employees receive relevant training
- Obtain legal advice on further improving our supplier contracts more specifically to exclude modern slavery and human trafficking
- Launch our internal 'Code of Conduct'
- Develop a Purchasing 'Code of Conduct' that specifies supplier obligations and includes contractual compliances clauses and KPIs regarding modern slavery and human trafficking
- Conduct on site audits (where appropriate, with qualified, independent 3rd party auditors) of our supply chain as appropriate and necessary to identify compliance gaps, validate human trafficking and slavery prevention practices and to build and improve the capability of those suppliers to avoid human trafficking and slavery issues
- Assess and, where material to our business, implement any relevant emerging best practice, either specific and/or applicable to our industry sector, related to the aims and objectives of the Act

In adopting these steps, we believe this will help to develop our effectiveness at mitigating human trafficking and promoting anti-slavery.

7 SUMMARY

This statement is made by The Bradfords Group Limited (03798374) for itself and also on behalf of Bradfords Building Supplies Limited (00278994), Snows Timber Limited (01549201), and Yeovil Plumbing Supplies Limited (04257385).

This statement is made pursuant to section 54(1) of the Act and constitutes our Group's slavery and trafficking statement for the financial year ending 31st March 2018. A full list of our subsidiary companies is held at The Bradfords Group's registered office. In accordance with the Act, this statement is published on our websites

5/24/2019

Our Modern Slavery Statement | The Bradfords Group

(www.thebradfordsgroup.co.uk and others).

Mark Eburne

Group CEO

1st July 2018

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